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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

DAN WYANT
DIRECTOR

June 22, 2005

Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern:

The Michigan Department of Agriculture (MDA) is pleased to support the efforts put forth in the National Animal Identification System (NAIS) "Draft Strategic Plan" and "Draft Program Standards." Animal Identification is the foundation necessary to support monitoring, surveillance, control and eradication programs throughout the entire United States. Therefore, it is vital to include all livestock species in the plan.

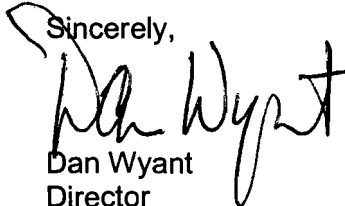
Additionally, it is important to recognize that these documents are "works in progress." The United States Department of Agriculture (USDA, APHIS) must continue to receive recommendations from industry and other interested parties relative to the proposed design and implementation of the NAIS. As the process moves forward, USDA is encouraged to design the program to support new technology as it becomes available and accepted.

One of the purposes of the NAIS is to allow for the tracking of all animal movements from birth to slaughter as part of USDA's National Animal Health Monitoring and Surveillance Program. It is critical that state and federal government officials retain individual animal data to promptly determine animal health status for the purpose of issuing both intrastate and interstate animal health movement certificates.

The State of Michigan has been using Radio Frequency Identification Device (RFID) tags for over three years in the Bovine Tuberculosis Eradication Program. The RFID tags have allowed trace backs and trace forwards to be done in hours, rather than weeks. Tag retention has been over 95% if installed properly. Read rate at the slaughter facilities is also well over 95%. Michigan supports the continued use of RFID tags until such time a better tag or device meets the program standards.

Michigan is committed to the successful development and implementation of the NAIS. I appreciate your continued efforts and look forward to working cooperatively on this initiative.

Sincerely,


Dan Wyant
Director

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